

**KAISER  
COAL****KAISER COAL CORPORATION**  
Sunnyside Coal Mines  
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August 8, 1985

Mr. Lowell P. Braxton  
Division of Oil, Gas & Mining  
355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203**RECEIVED****AUG 09 1985****DIVISION OF OIL  
& GAS & MINING**RE: Response to the Draft Technical  
Analysis, Sunnyside Mines, ACT/007/007

Dear Mr. Braxton:

As requested in your letters of June 27 and July 18, 1985, we are submitting a response to the deficiency items that were outlined. Changes were made in the MRP and fourteen (14) copies are attached for your inspection.

Please contact me if you should have any questions. I am planning to be in Salt Lake City starting August 19, 1985 to answer questions and make changes in MRP if needed. This will hopefully avoid time lags between your review and our response.

Sincerely yours,

Douglas C Pearce  
Mine Engineer

enclosures

ESPONSE  
OFFICE OF SURFACE MINING CONCERNS  
DRAFT TECHNICAL ANALYSIS

Item: June 27, 1985 Letter

1. Public notice was given in the Sun-Advocate July 3, 10, 17 and 24 that Kaiser Coal Corporation has submitted a complete permit application to the Division for review. Figure II-2 has been updated with new material.
2. Two copies of the information requested on reclaimed channels was submitted on August 2, 1985. Twelve additional copies are attached.
3. A copy of the NPDES change application was submitted to the Division on August 2, 1985. Figure III-8 is an approval letter from the EPA for the modification.
4. The results of the geotechnical study being conducted by Rollins, Brown and Gunnell will be submitted to the Division during the week of August 19, 1985.

Item: July 18, 1985 Letter

1. Plate III-12, D4-0094 has been revised to show a 48" culvert (SSSF C-3).
2. Plates III-12, D4-0081 and III-12, D4-0097 have been revised to show inter- and outer side slope configuration. The combined upstream and downstream side slopes are 1v:5.5h.
3. References to Figure III-4 and III-5 on page 4 of Chapter III have been changed to III-9 and III-10. The new Figures III-9 and III-10 have been provided.
4. The water monitoring plans in Chapters III and VII were reworded to reflect that Kaiser will submit, within 30 days of permit approval, a map showing the 12 in-mine monitoring locations. Reported springs N2CL-1, N2C-25 and an unnamed spring in the right fork of No. 2 Canyon were removed from the MRP spring sampling program after field sampling trips in May and June. No sign of the springs could be found at the locations marked on Plate VII-3. The reported spring in the right fork of No. 2 Canyon was plotted as described by a local stockman.

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This water source could not be verified in the field. Researching the baseline data collection notes showed that sites N2CL-1 and N2C-25 were marked wrong on the plate. Table VII-5 describes site N2CL-1 as a stream sample and site N2C-25 as an underground water sample from DDH-25. Plate VII-3 has been revised to show the correct site sample labels.

5. Table III-23 has been revised to correct the water parameter list.

6. A commitment to report annually, total water discharged is found in Section 7.1.5 of the MRP.

7. Section 3.3.5.4 of the MRP has been changed to fully address the comments in the Draft TA on explosives.

8. Section 3.4.9.1 of the MRP has been changed to state that inspection of slurry impoundments will be by a qualified registered professional engineer.

9. The East Slurry Cell is designed as a total containment evaporation pond without a discharge device. The structure has the capacity to contain the runoff from 10-100 year, 24 hour storm events. Calculations of capacity and runoff are found in Appendix III-1. Water from a 100 year, 24 hour storm event would evaporate in 40 days based on evaporation rates in Table XI-5 for the month of August. If the water is required to be removed from the pond in within 10 days, the total suspended solids of the discharge would probably not meet NPDES standards because of the amount of minus 300 mesh material that would remain in suspension.

10. Class I haul road plans were submitted August 2, 1985. Twelve additional copies are attached.